## OSBORN LAW P.C.

Daniel A. Osborn, Esq. Lindsay M. Trust, Esq. 43 West 43<sup>rd</sup> Street, Suite 131 New York, New York 10036

Phone: 212-725-9800 Facsimile: 212-500-5115 Email: info@osbornlawpc.com www.osbornlawpc.com

The proposed modified schedule is adopted.

SO ORDERED

**DEBRA FREEMAN** 

United States Magistrate Judge

Dated: 10/14/2021

October 13, 2021

## **VIA ECF**

Honorable Debra Freeman United States Magistrate Judge Daniel Patrick Moynihan Courthouse 500 Pearl Street New York, New York 10007

Re: Rosado v. Commissioner of Social Security,

Civil Action No. 1:21-cv-01280-GBD-DCF

Dear Judge Freeman,

We write on behalf of plaintiff, Charlie Rosado, and with the consent of the defendant, to request a 35-day extension of time to file plaintiff's motion for judgment on the pleadings. Plaintiff's motion is due on October 21, 2021. Plaintiff respectfully requests an extension of time up to and including November 26, 2021. This is plaintiff's second request for an extension. The request is necessitated by the number of briefs due to be filed by our office within the next 30 days.

Subject to the approval of the Court, the parties propose the following revised briefing schedule:

- a. Plaintiff to file his motion for judgment on the pleadings on or before November 26, 2021;
- b. Defendant to file its response/cross-motion on or before **January** 25, 2022; and
- c. Plaintiff to file his reply (if any) on or before February 15, 2022.

Honorable Debra Freeman October 13, 2021 Page 2

Thank you for your consideration of this request.

Respectfully submitted,

s/Daniel A. Osborn

Daniel A. Osborn
OSBORN LAW, P.C.
43 West 43<sup>rd</sup> Street, Suite 131
New York, New York 10036
Telephone: 212-725-9800
Facsimile: 212-500-5115

Facsimile: 212-500-5115 dosborn@osbornlawpc.com

cc: Joseph Pantoja, Esq. (by ECF)